



TOHONO O'ODHAM NATION
OFFICE OF THE
CHAIRMAN AND VICE CHAIRMAN



0000166527

EDWARD D. MANUEL
CHAIRMAN

VERLON M. JOSE
VICE CHAIRMAN



ORIGINAL

October 13, 2015

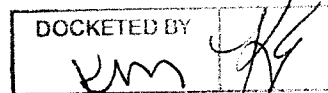
Director of Utilities
Arizona Corporation Commission
1200 West Washington Street
Phoenix, Arizona 85007

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Arizona Corporation Commission

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AZ CORP COMM
Director - Utilities

RE: Docket No. L-00000YY-15-0318-00171 -- In the Matter of the Application of SunZia Transmission LLC

Director of Utilities:

The Tohono O'odham Nation ("Nation") hereby makes a limited appearance in this matter by filing these comments on the Application of SunZia Transmission LLC. The Nation is a federally recognized Indian tribe located in southern Arizona. The Tohono O'odham have lived in the region known as the Papagueria since time immemorial. The Papagueria includes the lands proposed for SunZia Southwest Transmission Project in Arizona ("Project"). For several hundred years, the Tohono O'odham have used areas proposed for the Project for living, hunting, gathering, and for the creation of sacred sites. Cultural resource sites which are O'odham or ancestral to the O'odham are likely to be disturbed or destroyed by the Project. The proposed route will likely have an adverse impact on hundreds of Archaic, Hohokam, Sobaipuri, and Tohono O'odham cultural sites, many which will contain the burials of ancestors.

The fact that the proposed route impacts the San Pedro River Valley is particularly troubling for the Nation. The San Pedro River Valley is a significant place for the Tohono O'odham, not only for its cultural significance, but also for its ecological importance. A significant Sobaipuri site that may be adversely impacted by the Project that is located in the San Pedro Valley was likely visited by Father Kino in the late 17th century and may have been a refuge for Sobaipuri during the 1752 Pima revolt against the Spanish. The San Pedro River Valley is home to sensitive wildlife habitats and hosts a wide variety of migrating birds. The Nation's urges the Certificate of Environmental Compatibility be denied for the reasons set out herein.

The Nation has serious concerns with the adequacy of the cultural work performed to-date for the Project. First, despite a request by the Nation, a cultural landscape study has never been performed to fully evaluate the impacts on the cultural landscape. Second, no detailed cultural resource surveys have been completed in order to understand the full impacts of the proposed route. Instead, Class I and very limited Class II surveys have been completed for the Project.

The Nation requests that Class III cultural resource surveys be completed for the proposed route before a Certificate of Environmental Compatibility is issued for the Project.

However, if the Project does move forward, it is the Nation's strong preference that the Project be located along existing disturbance corridors to minimize impacts to the environment and cultural resources. Additionally, if the Committee decides to issue a Certificate of Environmental Compatibility, the Nation requests that the Applicant engage the services of Tohono O'odham Nation cultural monitors that will be present during all construction activities associated with the Project.

The proposed transmission line with right-of-way widths of 500-1000 ft. will have an adverse effect on many cultural resource sites that are regarded as ancestral by the Tohono O'odham Nation. In addition the cultural landscape of the project area, particularly the San Pedro Valley that was traditionally used by the Tohono O'odham would be severely degraded.

Sincerely,

A handwritten signature in black ink, appearing to read "Edward D. Manuel". The signature is fluid and cursive, with the first name "Edward" being more prominent and the last name "Manuel" following in a similar style.

Edward D. Manuel
Chairman